## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

IN RE:	)	
	)	Case No. 3:19-bk-01971
CAPSTONE PEDIATRICS, PLLC,	)	Chapter 11
	)	Judge Randal S. Mashburn
Debtor.	)	

## MOTION TO WITHDRAW AS COUNSEL

Comes now Matthew R. Murphy, counsel of record for America Cares Trust (ACT) d/b/a CareNation, and respectfully requests to be allowed to withdraw as counsel for this interested party in this case. In support of this Motion, Matthew R. Murphy (hereinafter "Movant") would state that he has performed all services pursuant to the scope of his engagement in this case, and Movant has notified this interested party of his disengagement and termination of legal services in this matter. Accordingly, pursuant to LBR 2091-1(b), Movant gives notice of its withdrawal by the filing of this motion and service pursuant to the Court's CM/ECF system and U.S. Mail. Movant would ask the Court to allow him to withdraw from representation of this interested party, and further requests the Court to release Movant from the responsibility of costs, bonds, and proceedings in connection with this case. Pursuant to LBR 2091-1(b), a copy of the Proposed Order allowing Movant to withdraw as counsel for record for America Cares Trust (ACT) d/b/a CareNation is being attached as an exhibit to this Motion.

Respectfully submitted,

By: <u>/s/ Matthew R. Murphy</u>

Matthew R. Murphy (#24627) Smythe Huff & Murphy PC

1222 16<sup>th</sup> Avenue South, Suite 301

Nashville, Tennessee 37212 Phone: (615) 255-4849

Fax: (615) 255-4855

mmurphy@smythehuff.com

## **CERTIFICATE OF SERVICE**

I hereby certify that I have sent a true and exact copy of the foregoing to the United Megan Seliber, Trial Attorney for the United States Trustee, David W. Houston, IV, Attorney for Debtor, and all other parties of record to receive notice electronically via the U.S. Bankruptcy Court's CM/ECF filing system and by United States Mail, first class, postage prepaid to the following entity:

America Cares Trust (ACT) 5655 Granny White Pike Brentwood, TN 37027

this the 1<sup>st</sup> day of September, 2020.

/s/ Matthew R. Murphy
Matthew R. Murphy